

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 -----X
4 AT LAST SPORTSWEAR, INC.,)
5)
6 Plaintiff,) 13 CV 2355 (WHP)
7)
8 v.)
9)
10 MICHAEL KAMENS,)
11)
12 Defendant and Third-Party Plaintiff,)
13)
14 v.)
15)
16 AT LAST SPORTSWEAR, INC.,)
17 BONNI DUCHON,)
18 SUNIL AHUJA, and)
19 SANJAY ISRANI,)
20)
21)
22 Third-Party Defendants.)
23 -----X
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16 DEPOSITION OF
17 SANJAY ISRANI
18 NEW YORK, NEW YORK
19 SEPTEMBER 10, 2013
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22

23 ATKINSON-BAKER, INC.
24 COURT REPORTERS
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REPORTED BY: HELEN SHUM
FILE NO.: A709980

1 S. ISRANI

2 Q. Have you prepared for today's deposition
3 prior to today?

4 A. I had a conversation with our attorney a
5 few days ago, and that's it.

6 Q. Have you brought any documents with you
7 today?

8 A. No, I have not.

9 MR. ANDREWS: I did want to state for the
10 record -- this is not a question. It's something
11 I wanted to state for the record. Mr. Kamens,
12 the Defendant, just served his request for
13 production of documents yesterday. We recognize
14 that there has been no opportunity for you or
15 anyone else at your company to have responded to
16 them.

17 Today's deposition will be relatively
18 short, and the Defendant reserves the right to
19 continue the deposition at a latter date once
20 documents are produced. Your attorney may object
21 to that, and she'll have every opportunity to say
22 what she wants to say.

23 Your company and you have been served with
24 a document request. You will have approximately
25 30 days to respond. Depending on the documents

1 S. ISRANI

2 that are produced, we may seek to continue the
3 deposition, and that's not a question for you.

4 That's really directed to your attorney, if
5 Ms. Windholz wants to respond.

6 MS. WINDHOLZ: Thank you. I appreciate
7 that. Rule 30 of the Federal Rules of Civil
8 Procedure expressly provides that depositions are
9 to be conducted over the course of one day.
10 Parties are allowed seven hours over one day, not
11 a series of days, one day in which to conduct the
12 deposition.

13 You're allowed to take your full seven
14 hours today, but after today, Mr. Israni's
15 deposition will be closed. A decision was made
16 by Mr. Kamens' Counsel to take the Third-Party
17 Defendant's deposition prior to serving
18 discovery. That was a decision that was made,
19 and we're not going to keep this deposition open
20 pending receipt of the responses to the discovery
21 request served to us yesterday.

22 Q. Okay. We'll continue with the deposition
23 now.

24 You testified that you work in the Secaucus
25 office. Do you maintain an office in more than one